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August 16, 2004

Via Facsimile and First-Class Mail

Jeff S. Jordan, Esq.
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: MUR 5474—Moveon PAC and Moveon.org, Inc., Respondents

Dear Mr. Jordan:

The undersigned represent Moveon PAC and Wes Boyd, as well as Moveon.org, a 501(c)(4) organization. Moveon PAC is a federal political committee that is registered with the Commission. Moveon.org is a nonprofit corporation and a social welfare organization exempt from taxation under section 501(c)(4) of the Internal Revenue Code. Moveon.org is not a federal political committee nor does it claim status as an MCFL corporation.

This matter appears to be generated by certain content of a website created by filmmaker Michael Moore and/or his production company (www.michaelmoore.com). The complaint alleges that certain content on the website constitutes an illegal corporate in-kind contribution by Michael Moore's company. That allegation is baseless. First, with respect to the complaint, the only reference to moveon.org appears to be a link to a portion of a website operated by Moveon.org Voter Fund. Moveon.org Voter Fund is an unincorporated association that is formed under section 527 of the Internal Revenue Code and is not a federal political committee. There appear to be no references to Moveon PAC or Moveon.org in the documentation attached to the complaint.

Second, review of the current content of michaelmoore.com reveals no references whatsoever to any Moveon organization.

Accordingly, since there is no reference whatsoever to Moveon PAC on michaelmoore.com, no illegal corporate contribution could have been accepted by Moveon PAC and there is no factual basis to conclude that Moveon PAC has received

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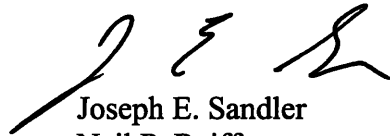
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any corporate contribution that is prohibited by 2 U.S.C. § 441b. Even if there was a reference to Moveon PAC on the michaelmoore.com website, no illegal contribution would result since it is our understanding that michaelmoore.com does not ordinarily charge any fee for hyperlinks. *See* FEC Advisory Opinion 1999-17. Furthermore, any reference to either Moveon.org Voter Fund or Moveon.org is outside the scope of the Federal Election Campaign Act since neither entity is a federal political committee.

Based upon the foregoing, the Commission should find no reason to believe that Moveon PAC, Moveon.org or Moveon.org Voter Fund violated any provision of the Federal Election Campaign Act and close the file with respect to this matter.

Sincerely,

Handwritten signatures of Joseph E. Sandler and Neil P. Reiff.

Joseph E. Sandler
Neil P. Reiff
Counsel for Moveon PAC and Wes
Boyd, as Treasurer; and Moveon.org,
Inc.

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